



State of Ohio Environmental Protection Agency

Northeast District Office

E. Aurora Road  
Cincinnati, Ohio 44087-1969  
(216) 425-9171



Richard F. Celeste  
Governor

May 11, 1988

RE: GMC-BOC LORDSTOWN ASSEMBLY  
TRUMBULL COUNTY  
OHD 020-632-998

CERTIFIED MAIL

GMC-BOC Lordstown Assembly  
2300 Hallock-Young Road  
Box 1406  
Warren, Ohio 44482

Attn: T. E. Will,  
Director of Plant Engineering

Dear Mr. Will:

On April 26, 1988, I conducted a hazardous waste inspection at your facility. Ben Kristan and Julie Blackburn participated in the inspection. Enclosed is a copy of the inspection report. The following violations were noted.

1. The drum storage pad had pallets of drums stacked three high, and four pallets deep with no aisle space. (40 CFR 265.35/OAC 3745-65-35)
2. Because of the manner in which the containers were stored it would not be possible to inspect the condition of all the drums to determine if they are leaking or corroding. (40 CFR 265.171 and 174/OAC 3745-66-71 and 74)
3. Spillage was apparent over most of the floor of the inside tank farm. (40 CFR 265.194, 195 and 196/OAC 3745-66-94)
4. Assessments of the integrity of the hazardous waste tanks certified by an independent, qualified registered professional engineer were not on file. (40 CFR 265.191)

Please submit within 30 days of the date of this letter documentation demonstrating you have corrected the above violations. Documentation should include pictures of the drum storage pad clearly showing aisles have been created, sample results of the material(s) spilled in the indoor tank farm determining if it is hazardous, an explanation of how the spilled material was cleaned up and how it was disposed of, and copies of the integrity assessments for the two hazardous waste tanks.

Be advised compliance with financial requirement regulations is reviewed by our Central Office staff. I noted your 1987 annual report gives a closure cost estimate of \$1,450,000 while your closure plan gives a closure cost estimate of \$276,950. Please explain this discrepancy.

GMC-BOC Lordstown Assembly  
May 11, 1988  
Page -2-

A copy of the RCRA Land Disposal Restriction Inspection Form is enclosed. This form is being forwarded to U.S. EPA for appropriate follow-up action by their staff.

Should you have questions regarding this letter, please contact me.

Sincerely,

*Sheryl K. Slone*

Sheryl K. Slone  
Environmental Engineer  
Division of Solid and Hazardous Waste  
Management

SKS/sp

Enclosure

cc: Dan Hanket, Attorney General's Office  
Dave Sholtis, DSHWM, Central Office  
Debby Berg, DSHWM, NEDO

<b>SENDER:</b> Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.	
1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address.	2. <input type="checkbox"/> Restricted Delivery.
3. Article Addressed to: GMC-BOC Lordstown Assembly 2300 Hallock-Young Road Box 1406 Warren, Ohio 44482 Attn: Mr. T. E. Will	4. Article Number P- 680-491-534 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .
5. Signature - Addressee <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent <i>[Signature]</i>	
7. Date of Delivery 5/11/88	

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: GMC - BCC - LORDSTOWN

U.S. EPA I.D. No.: CHD 020 632 998

Street: 2300 HALLOCK-YOUNG RD. Box 1406

City: WARREN State: OHIO Zip Code: 44482

Telephone: 216-824-5795

Operator: BEN KRISTAN

Street: (SAME)

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: 216-824-5795

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 4/26/88 Time: 9:30 - 6:00 Weather Conditions: \_\_\_\_\_

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>SHERYL SLONE</u>	<u>CEPA</u>	<u>216-425-9171</u>

Facility Representatives: BEN KRISTAN

JULIE BLACKBURN

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>✓</u>	<u>✓</u>	<u>✓</u>
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	<u>✓</u>
Disposer	_____	_____	_____

## INSPECTION SUMMARY



**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>					
1. F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. F002	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. F003	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. F005	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
No Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<del>DOES</del> Mercury	20 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
UNKNOWN Nickel	134 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L No

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 (SPILLS) <sup>LAST 12</sup>

<u>✓</u>	_____	<u>✓</u>	_____	_____
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4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to (1986 TRANSFORMER LEAK)

50 ppm	<u>✓</u>	_____	<u>✓</u>	_____	_____
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500 ppm	_____	_____	_____	_____	_____
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Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

✓ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

FLOOR DRY MATERIAL, ETC. TO CLEAN UP LEAKED PCB MATERIAL.

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L No

_____	_____	_____	_____	_____
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Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☐ NA

If yes, specify the method: SENT TO ENSCO, CHEM. WASTE MANAGEMENT

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

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*Is it in 5  
Can they store  
why*

*HAVEN'T SHIPPED IT  
SINCE JULY 1987*

B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ NoIf yes, note how this is adequate: MSDS OF MATERIAL  
ASSUMES WASTES EXCEED TREATMENT STANDARDS

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

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- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

PURGE THINNER, CLEAN-UP THINER  
RAGS, DEGREASERS, ADHESIVES

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

MSDS reviewed, then sample and analyze  
for F solvents

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☒ No ☐ NA

MERCURY SHIPPED IN SWITCH DEVICE

Revised 11-03-87



- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☒ No ☐ NA

What type of absorbent is used? N.A.

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on: *Waste Determination* NICKEL CONCENTRATION NEEDS TO BE TESTED.

- Knowledge of wastes

☐ Yes ☒ No ☐ NA

If yes, note how this is adequate: \_\_\_\_\_

- Testing

☒ Yes ☐ No ☐ NA

If yes, list test method used: pH

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels? *DON'T DO A PFLT*

☐ Yes ☒ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes      ☐ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes      ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]? *(not documented for each shipment)*

☒ Yes      ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes      ☐ No

Applicable treatment standards ☒ Yes      ☐ No

Manifest number ☒ Yes      ☐ No

Waste analysis data, if available ☒ Yes      ☐ No

*\* WASTE PROFILE COMPLETED BEFORE TRANSPORTED.*

Identify off-site treatment or storage facilities: MICHIGAN  
RECOVERY SYSTEM, RESEARCH CIL

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes      ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? N.A.

☐ Yes      ☐ No

If yes, does notification contain the following? N.A.

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes  
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☒ Yes ☐ No

If yes, list types of waste treatment units and processes:

tanks - heavy metal precipitation & pH adjustment

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS NA.

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☐ Yes ☐ No

If yes, check the appropriate regulatory status:

☐ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_

\_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☐ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☐ No



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA

o California List ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? 3/87

b. Are analyses conducted on-site or off-site?

(VERIFICATION)  
☒ On-site ☒ Off-site

Identify off-site lab: WADSWORTH-AUGER LABS

- c. Is F-solvent waste analyzed using TCLP? (SOME SAMPLES SENT OUT FOR TCLP BUT ANALYSIS NOT BACK.)  
☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: ONCE/YEAR OR WHEN A PROCESS CHANGES

e. Describe procedures used to identify manifest discrepancies:

HAVEN'T HAD DISCREPANCIES ON TYPES OF WASTES

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? TCLP HAS NOT YET BEEN COMPLETED. UNKNOWN NICKEL LEVELS.  
☐ Yes ☒ No

154 photos  
HS being  
done?

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?
- UNKNOWN

☐ Yes ☐ No ☐ NAaisle space was not adequate to determine.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?
- UNKNOWN - SEE COMMENT FOR QUESTION #3

☐ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No

If yes, state how: \_\_\_\_\_

They Don't have  
is for storage

→ 268.50 (A)(3) (c)  
submit proof.

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes      ☐ No      ☐ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes      ☐ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes      ☐ No      ☐ NA

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C. Treatment N.A.

1. Does the facility treat restricted wastes other than in surface impoundments?

☐ Yes      ☐ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

☐ Yes      ☐ No

4. Describe frequency of testing treatment residuals:

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5. Is dilution used as a substitute for treatment?

☐ Yes      ☐ No

6. Are notifications prepared by the generators kept in the facility's operating record?  
       \_\_\_\_\_ Yes       \_\_\_\_\_ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?  
       \_\_\_\_\_ Yes       \_\_\_\_\_ No       \_\_\_\_\_ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

\_\_\_\_\_ Yes       \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**D. Treatment in Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment?  
       \_\_\_\_\_ Yes       ✓ \_\_\_\_\_ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

\_\_\_\_\_ Yes       \_\_\_\_\_ No



3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site      \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

E. Land Disposal *N.A.*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_

\_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_

\_\_\_\_\_

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

4/26/88 2:30-6:00 PM  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

~~HAZAR~~ #

GENERAL INFORMATION

U.S. EPA I.D. # OHD 020 632 978

Facility: GMC-BOC - LORESDOWN Address: 2300 HALLOCK-YOUNG RD., Box 1406 City: WARREN  
State: OHIO Zip Code: 44182 County: TRUMBULL Telephone: 216.824.5512

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>BEN KRISTAN</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>216.824.5725</u>
2.	<u>JULIE BLACKBURN</u>	<u>CHEMICAL ENGINEER</u>	
3.			

INSPECTOR(S)

1.	<u>SHERRY SLONE</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>216.425.9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)  
☐ Transporter (T)  
☐ TSDF only  
☒ G-T  
☒ G-TSDF  
☐ T-TSDF  
☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure  
☒ Containers S01  
☒ Tanks S02/T01  
☐ Surface Impoundments S04/T02  
☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03  
☐ Land Treatment D01  
☐ Landfills D80  
☐ Chemical/Physical/Biological T04  
☐ Groundwater Monitoring  
☐ Post-Closure



# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓	—	—	1981
2. If "yes", is it complete and accurate?	—	✓	—	#1
3. Has the facility submitted a Part B?	✓	—	—	—
4. Has advance notice of the inspection given? If so, how far in advance?	✓	—	—	5 DAYS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

## REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

#1 The two lagoons and two sludge drying beds are closed.

This facility assembles passenger cars and vans. Current hazardous waste storage units include a drum storage pad and two hazardous waste storage tanks. The following waste streams are currently generated:

1. D001, F003, F005 - Purge thinner - toluene → tank #14 via pipelines from van plant
2. D001, F003, F005 - Clean up thinners and scrap paint → tank #1 via drums → tank → pipelines from passenger plant
3. D006, D008 - Fly Ash → drums (Enviro-safe)
4. D008 - Paint Filters (ELPO) → drums
5. D008 - Paint Sludge (ELPO) → drums
6. D001, F002, F003, F005 - Rags - alcohol, trichloroethane, toluene, → drums
7. F002 - Chlorinated Solvents - wipe solvent in body shop, pipe fitting cleaner, purging of sealer → drums
8. D001, F005 - Adhesives - Scrap from production → drums
9. D002 - Corrosive - acid spill cleanup → drums
10. F001 - Degreasers - INFORMATION 2 solvents → drums

Revised 2/04

12. D009 - Ignition Switches - mercury tubes or thermostats from production equipment
13. WSTP Sludge - ELPD system discharges to WSTP - wastes are being manifested as F006.
14. D001 - Petroleum Naphtha - parts cleaner → Safety Klean
15. D002 - Caustic Sludge - from caustic dip tank → drums

Aug 8 '98

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a. Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓	—	—	—
b. Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓	—	—	—
c. The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓	—	—	—
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a. The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b. The date that accumulation began is clearly marked on each container.	—	—	✓	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	✓	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS



# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

### Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

✓ — — —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

✓ — — —

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

✓ — — —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

✓ — — —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

✓ — — —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

✓ — — —

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

✓ — — —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	✓	—	—	—
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	✓	—	—	—
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	✓	—	—	—
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	✓	—	—	—
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	✓	—	—	—
b) Physical separation of incompatible waste materials.	✓	—	—	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓	—	—	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart C: Preparedness and Prevention

- |  |               |               |               |               |
|--|---------------|---------------|---------------|---------------|
| 1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]  | <u>      </u> | <u>  ✓  </u>  | <u>      </u> | <u>      </u> |
| 2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]   |               |               |               |               |
| a) Internal alarm system.  | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| b) Access to telephone, radio or other device for summoning emergency assistance.  | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| c) Portable fire control equipment.  | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.   | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| 3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]   | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| 4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]   | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]  | <u>      </u> | <u>  ✓  </u>  | <u>      </u> | <u>  #1  </u> |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] | <u>  ✓  </u>  | <u>      </u> | <u>      </u> | <u>      </u> |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]   | <u>      </u> | <u>      </u> | <u>  ✓  </u>  | <u>      </u> |

#1. Drum storage pad had pallets stacked 3 high, 4 pallets deep, with no aisles.



# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident. ☒ ☐ ☐ ☐
  - b) Arrangements or agreements with local or state emergency authorities. ☒ ☐ ☐ ☐
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒ ☐ ☐ ☐
  - d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒ ☐ ☐ ☐
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ☒ ☐ ☐ ☐
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ☒ ☐ ☐ ☐
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ☒ ☐ ☐ ☐
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ☒ ☐ ☐ ☐
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ☐ ☐ ☒ ☐

# RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark #

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- |  |   |   |   |   |
|--|---|---|---|---|
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]     | ✓ | — | — | — |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).   | ✓ | — | — | — |
| c) The estimated (or actual) weight, volume or density of the waste material(s).   | ✓ | — | — | — |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).   | ✓ | — | — | — |
| e) The present physical location of each hazardous waste within the facility.  | ✓ | — | — | — |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)] | — | — | ✓ | — |
| g) Records of any waste analyses and trial tests required to be performed.   | ✓ | — | — | — |
| h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).  | ✓ | — | — | — |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]   | ✓ | — | — | — |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.   | ✓ | — | — | — |

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]

☒   ☐   ☐   \_\_\_\_\_

**NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.**

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]

\_\_\_\_\_   ☒   \_\_\_\_\_

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]

\_\_\_\_\_   ☒   \_\_\_\_\_

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]

\_\_\_\_\_   ☒   \_\_\_\_\_

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]

\_\_\_\_\_   ☒   \_\_\_\_\_

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]

\_\_\_\_\_   ☒   \_\_\_\_\_



RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart G: Closure and Post-Closure

**NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.**

- |   |                                     |                          |                                     |                          |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) A description of steps taken to decontaminate facility equipment.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| e) The year closure is expected to begin and a schedule for the various phases of closure.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]                          | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]                          | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

RCRA INTERIM STATUS INSPECTION FORM

(TO BE REVIEWED BY CENTRAL OFFICE)

Yes   No   N/A   Remark #

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
  - a) A closure trust fund, or
  - b) A surety bond, or
  - c) A closure letter of credit, or
  - d) A combination of financial mechanisms.
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?
3. When was the most recent estimate made?
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?
5. When was the most recent estimate made?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	#1 _____
_____	_____	_____	#1 _____
_____	_____	✓	_____
_____	_____	✓	_____

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

#1 The annual report for 1987, signed 2/25/88 lists \$1,450,000 as the closure cost estimate. However, the closure plan lists \$276,950 as the closure cost estimate as of 3/87.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓	—	—	—
b) In good physical condition (265.171) [3745-66-71]	✓	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓	—	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	—	—	—	#1
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓	—	—	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓	—	—	—

#1 It is impossible to inspect all the drums without aisle space.

# RCRA INTERIM STATUS INSPECTION FORM

#1 - 22 yrs. old  
#14 - 22 yrs. old

## Subpart J: Storage in Tanks

Yes   No   N/A   Remark #

- |   |   |   |   |    |
|---|---|---|---|----|
| 1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)]. (PART B DESCRIPTION)   | ✓ | — | — | #1 |
| 2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]   | — | — | ✓ | —  |
| 3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]   | ✓ | — | — | #2 |
| 4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]  | ✓ | — | — | #3 |
| 5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)] |   |   |   |    |
| a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.  | — | — | ✓ | —  |
| b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.   | — | — | ✓ | —  |

#1 - Outside Tank #4 is stucked to determine level as well as reading a level gage.

#2 - much spillage was evident on floor of indoor tank farm.

#3 - an assessment of the integrity of the tanks certified by an independent qualified, registered professional engineer was not on file.



RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].

—   ☒   —   —

b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

☒   —   —   —

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]

—   —   —   UNKNOWN

8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]

—   —   ☒   —

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]

—   —   ☒   —

4/26/88 2:30-6:00 PM  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IMPAB #

GENERAL INFORMATION

U.S. EPA I.D. # OHD 020 632 978

Facility: SNC-BOC - LORDSTOWN Address: 2300 HALLOCK-YOUNG RD., Box 1406 City: WARREN  
State: OHIO Zip Code: 44182 County: TRUMBULL Telephone: 216-824-5512

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>BEN KRISTAN</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>216-824-5195</u>
2.	<u>JULIE BLACKBURN</u>	<u>CHEMICAL ENGINEER</u>	
3.			

INSPECTOR(S)

1.	<u>CHERRY CLONE</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☒ Generator only (G)  
☒ Transporter (T)  
☐ TSDF only  
☐ G-T  
☒ G-TSDF  
☐ T-TSDF  
☐ G-T-TSDF

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure  
☒ Containers S01  
☒ Tanks S02/T01  
☐ Surface Impoundments S04/T02  
☐ Incineration/Thermal Treatment

☐ Waste Piles S03  
☐ Land Treatment D01  
☐ Landfills D00  
☐ Chemical/Physical/Biological T04  
☐ Groundwater Monitoring  
☐ Post-Closure



# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Was the facility submitted a Part A to Ohio?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1781</u>
2. If "yes", is it complete and accurate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>#1</u>
3. Was the facility submitted a Part B?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>      </u>
4. Was advance notice of the inspection given? If so, how far in advance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>5 DAYS</u>

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

## REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

#1 The two lagoons and two sludge drying beds are closed.

This facility assembles passenger cars and vans. Current hazardous waste storage units include a drum storage pad and two hazardous waste storage tanks. The following waste streams are currently generated:

1. D001, F003, F005 - Purge thinner - toluene → tank #14 via pipelines from van plant
2. D001, F003, F005 - Clean up thinners and scrap paint → tank #1 via drums → tank → pipelines from passenger plant
3. D006, D008 - Fly Ash → drums (Enviro-safe)
4. D008 - Paint Filters (ELPO) → drums
5. D008 - Paint Sludge (ELPO) → drums
6. D001, F002, F003, F005 - Rags - alcohol, trichloroethane, toluene, → drums
7. F002 - Chlorinated Solvents - wipe solvent in body shop, pipe fitting cleaner, purging of sealer → drums
8. D001, F005 - Adhesives - ~~Scrap from production~~ <sup>Scrap from production</sup> → drums
9. D002 - Corrosive - acid spill cleanup → drums
10. F001 - Degreasers - <sup>INFORMATION</sup> <sup>2</sup> chlorinated solvents → drums
11. D001 - Waste Paint -

12. D009 - Sagnitron Switches - mercury tubes or thermostats from production equipment
13. WSTP Sludge - EPO system discharges to WSTP - wastes are being manifested as F006.
14. D001 - Petroleum Naptha - parts cleaner → Safety Klean
15. D002 - Caustic Sludge - from caustic dip tank → drums

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a. Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓	—	—	—
b. Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓	—	—	—
c. The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓	—	—	—
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a. The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b. The date that accumulation began is clearly marked on each container.	—	—	✓	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	✓	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## 10 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes    No    N/A    Remark #

### Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

✓    —    —    —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste.  
(Section 265.13(b)) [3745-65-13(B)]

✓    —    —    —

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility?  
(265.14(a)(1)) [3745-65-14(A)(1)]

✓    —    —    —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

✓    —    —    —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

✓    —    —    —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

✓    —    —    —

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

✓    —    —    —



# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] —   ☒   —   —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
  - a) Internal alarm system. ☒   —   —   —
  - b) Access to telephone, radio or other device for summoning emergency assistance. ☒   —   —   —
  - c) Portable fire control equipment. ☒   —   —   —
  - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ☒   —   —   —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ☒   —   —   —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ☒   —   —   —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] —   ☒   —   #1
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ☒   —   —   —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] —   —   ☒   —

#1. Drum storage pad had pallets stacked 3 high, 4 pallets deep, with no aisles.

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart D: Contingency and Emergency

- |   |   |     |     |     |     |
|---|---|-----|-----|-----|-----|
| 1 | The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:                                    |     |     |     |     |
|   | a) Actions to be taken by personnel in the event of an emergency incident.  | ✓   | --- | --- | --- |
|   | b) Arrangements or agreements with local or state emergency authorities.  | ✓   | --- | --- | --- |
|   | c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.   | ✓   | --- | --- | --- |
|   | d) A list of all emergency equipment including location, physical description and outline of capabilities.  | ✓   | --- | --- | --- |
|   | e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]   | ✓   | --- | --- | --- |
| 2 | A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] | ✓   | --- | --- | --- |
| 3 | The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]  | ✓   | --- | --- | --- |
| 4 | An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]          | ✓   | --- | --- | --- |
| 5 | If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] | --- | --- | ✓   | --- |



# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1 The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- |  |   |   |   |   |
|--|---|---|---|---|
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]     | ✓ | — | — | — |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).   | ✓ | — | — | — |
| c) The estimated (or actual) weight, volume or density of the waste material(s).   | ✓ | — | — | — |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).   | ✓ | — | — | — |
| e) The present physical location of each hazardous waste within the facility.  | ✓ | — | — | — |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)] | — | — | ✓ | — |
| g) Records of any waste analyses and trial tests required to be performed.   | ✓ | — | — | — |
| h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).  | ✓ | — | — | — |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]   | ✓ | — | — | — |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.   | ✓ | — | — | — |

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- |   |           |           |           |           |
|---|-----------|-----------|-----------|-----------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]  | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]  | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)                           | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| d) A description of steps taken to decontaminate facility equipment.  | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| e) The year closure is expected to begin and a schedule for the various phases of closure.  | <u>✓</u>  | <u>  </u> | <u>  </u> | <u>  </u> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]                          | <u>  </u> | <u>  </u> | <u>✓</u>  | <u>  </u> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]                          | <u>  </u> | <u>  </u> | <u>✓</u>  | <u>  </u> |

# RCRA INTERIM STATUS INSPECTION FORM

(TO BE REVIEWED BY CENTRAL OFFICE)

Yes No N/A Remark #

## Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

## REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

#1 The annual report for 1987, signed 2/25/88 lists \$1,450,000 as the closure cost estimate. However, the closure plan lists \$276,750 as the closure cost estimate as of 3/87.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓	—	—	—
b) In good physical condition (265.171) [3745-66-71]	✓	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓	—	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	—	—	—	#1
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓	—	—	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓	—	—	—

#1 It is impossible to inspect all the drums without aisle space.

# RCRA INTERIM STATUS INSPECTION FORM

#1 - 22 yrs. old  
#14 - 22 yrs. old

## Subpart J: Storage in Tanks

Yes - No N/A Remark #

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].

(PART B  
DESCRIPTION)

✓ — — #1

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]

— — ✓ —

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]

✓ — — #2

4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]

✓ — — #3

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]

a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

— — ✓ —

b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

— — ✓ —

#1 - Outside Tank #14 is sticked to determine level as well as reading a level gage.

#2 - much spillage was evident on floor of indoor tank farm.

#3 - An assesment of the integrity of the tanks certified by an independent qualified, registered professional engineer was not on file.

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].		<input checked="" type="checkbox"/>		
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<input checked="" type="checkbox"/>			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]				
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			<input checked="" type="checkbox"/>	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]			<input checked="" type="checkbox"/>	
				<u>UNKNOWN</u>



# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: GMC - BCC - LORDSTOWN

U.S. EPA I.D. No.: OHIO 020 632 998

Street: 2300 HALLOCK-YOUNG RD. Box 1406

City: WARREN State: OHIO Zip Code: 44482

Telephone: 216-824-5795

Operator: BEN KRISTAN

Street: (SAME)

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: 216-824-5795

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 4/26/88 Time: 9:30 - 6:00 Weather Conditions: \_\_\_\_\_

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>SHERBY SLONE</u>	<u>CEPA</u>	<u>216-425-9171</u>

Facility Representatives: BEN KRISTAN

JULIE BLACKBURN

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>✓</u>	<u>✓</u>	<u>✓</u>
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	<u>✓</u>
Disposer	_____	_____	_____

## INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>					
1. F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. F002	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. F003	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. F005	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
No Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOOR No Mercury	20 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
UNKNOWN Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L No

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 (SPILLS) LAST SPILL 12/1/88

<u>✓</u>	_____	<u>✓</u>	_____	_____
----------	-------	----------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to (1986 TRANSFORMER LEAK)

50 ppm	<u>✓</u>	_____	<u>✓</u>	_____	_____
--------	----------	-------	----------	-------	-------

500 ppm	_____	_____	_____	_____	_____
---------	-------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

✓ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

FLOOR DRY MATERIAL, ETC. TO CLEAN UP LEAKED PCB MATERIAL.

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L No

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing  
☐ spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

HAVEN'T SHIPPED ANY  
SINCE JULY 1987

☐ Yes      ☐ No      ☐ NA

If yes, specify the method: SENT TO ENSCO CHEM. WASTE MANAGEMENT

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ NoIf yes, note how this is adequate: MSDS OF MATERIAL  
ASSUMES WASTES EXCEED TREATMENT STANDARDS

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

PURGE THINNER, CLEAN-UP THINNER  
RAGS, DEGREASERS, ADHESIVES

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

MSDS reviewed, then sample and analyze  
for F solvents

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☒ No ☐ NA

MERCURY SHIPPED IN SWITCH DEVICE

Revised 11-03-87

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

What type of absorbent is used? N.A.

Check the types of waste to which absorbent is added.

\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2

\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

\_\_\_\_ Liquid hazardous waste containing metals

\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on: NICKEL CONCENTRATION NEEDS TO BE TESTED.

- Knowledge of wastes

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

If yes, note how this is adequate: \_\_\_\_\_

- Testing

☒ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, list test method used: pH

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels? DON'T DO A PFLT

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]? *(not documented for each shipment)*

☒ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

*\* WASTE PROFILE COMPLETED BEFORE TRANSPORTED.*  
Identify off-site treatment or storage facilities: MICHIGAN  
RECOVERY SYSTEM, RESEARCH OIL

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? N/A

☐ Yes ☐ No

If yes, does notification contain the following? N.A.

EPA Hazardous waste number(s) \_\_\_\_\_ Yes \_\_\_\_\_ No

Applicable treatment standards \_\_\_\_\_ Yes \_\_\_\_\_ No

Manifest number \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_

Waste analysis data, if available ☐ Yes ☐ No

Certification that the waste meets treatment standards \_\_\_\_\_ Yes \_\_\_\_\_ No

Identify off-site land disposal facilities: \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

       Yes             No      ✓ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265? ☒

☒ Yes ☐ No

If yes, list types of waste treatment units and processes:

banks - heavy metal precipitation & pH adjustment

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS NA.

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☐ Yes ☐ No

If yes, check the appropriate regulatory status:

☐ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☐ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☐ No



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent      ☐ Yes      ☒ No      ☐ NA  
 o California List      ☐ Yes      ☒ No      ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes      ☐ No

- a. What date was the waste analysis plan last revised? 3/87

- b. Are analyses conducted on-site or off-site?

(VERIFICATION)  
☒ On-site      ☒ Off-site

Identify off-site lab: WADSWORTH-AUBERT LABS

- c. Is F-solvent waste analyzed using TCLP? (SOME SAMPLES SENT OUT FOR TCLP, BUT ANALYSIS NOT BACK.)  
☐ Yes      ☒ No      ☐ NA

- d. Describe the frequency of sampling: ONCE/YEAR OR WHEN A PROCESS CHANGES

- e. Describe procedures used to identify manifest discrepancies:

HAVEN'T HAD DISCREPANCIES ON TYPES OF WASTES

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☐ Yes      ☒ No

TCLP HAS NOT YET BEEN COMPLETED. UNKNOWN NICKEL LEVELS.

B. Storage (263.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?
- UNKNOWN

☐ Yes ☐ No ☐ NAaisle space was not adequate to determine.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?
- UNKNOWN - SEE COMMENT FOR QUESTION #3.

☐ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No

If yes, state how: \_\_\_\_\_

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes      ☐ No      ☐ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes      ☐ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes      ☐ No      ☐ NA

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C. Treatment N.A.

1. Does the facility treat restricted wastes other than in surface impoundments?

☐ Yes      ☐ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

☐ Yes      ☐ No

4. Describe frequency of testing treatment residuals:

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5. Is dilution used as a substitute for treatment?

☐ Yes      ☐ No

6. Are notifications prepared by the generators kept in the facility's operating record? ☐ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☐ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements? ☐ Yes ☐ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_

\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No



- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

E. Land Disposal *N.A.*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_  
 \_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_  
 \_\_\_\_\_

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA